

## Magistrate Judge John L. Weinberg

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

| NO. MJ20-615

Plaintiff,

## MOTION FOR DETENTION

V.

GYEONG JEI LEE,

**Defendant.**

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f)

**1. Eligibility of Case.** This case is eligible for a detention order because this case involves (check all that apply):

- Crime of violence (18 U.S.C. § 3156).
- Crime of Terrorism (18 U.S.C. § 2332b (g)(5)(B)) with a maximum sentence of ten years or more.
- Crime with a maximum sentence of life imprisonment or death.
- Drug offense with a maximum sentence of ten years or more.

- 1       Felony offense and defendant has two prior convictions in the four  
2      categories above, or two State convictions that would otherwise fall within  
3      these four categories if federal jurisdiction had existed.
  
- 4       Felony offense involving a minor victim other than a crime of violence.
  
- 5       Felony offense, other than a crime of violence, involving possession or use  
6      of a firearm, destructive device (as those terms are defined in 18 U.S.C. §  
7      921), or any other dangerous weapon.
  
- 8       Felony offense other than a crime of violence that involves a failure to  
9      register as a Sex Offender (18 U.S.C. § 2250).
  
- 10      Serious risk the defendant will flee.
  
- 11      Serious risk of obstruction of justice, including intimidation of a  
12      prospective witness or juror.

13     2. **Reason for Detention.** The Court should detain defendant because there  
14      are no conditions of release which will reasonably assure (check one or both):

- 15      Defendant's appearance as required.
  
- 16      Safety of any other person and the community.

17     3. **Rebuttable Presumption.** The United States will invoke the rebuttable  
18      presumption against defendant under § 3142(e). The presumption applies because:

- 19      Probable cause to believe defendant committed offense within five years of  
20      release following conviction for a qualifying offense committed while on  
21      pretrial release.
  
- 22      Probable cause to believe defendant committed drug offense with a  
23      maximum sentence of ten years or more.
  
- 24      Probable cause to believe defendant committed a violation of one of the  
25      following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or  
26      kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).

Probable cause to believe defendant committed an offense involving a victim under the age of 18 under 18 U.S.C. §§1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

4. **Time for Detention Hearing.** The United States requests the Court conduct the detention hearing:

- At the initial appearance
- After a continuance of 3 days (not more than 3)

DATED this 25<sup>th</sup> day of September, 2020.

Respectfully submitted,

BRIAN T. MORAN  
United States Attorney

s/ Marie M. Dalton  
MARIE M. DALTON  
Assistant United States Attorney